

COPY

MURPHY SHENEMAN JULIAN & ROGERS  
A Professional Corporation  
MARGARET SHENEMAN (S.B. No. 072718)  
ERIC E. SAGERMAN (S.B. No. 155496)  
KEITH A. MCDANIELS (S.B. No. 189213)  
101 California Street, Suite 3900  
San Francisco, CA 94111  
Telephone Number: (415) 398-4700  
Facsimile Number: (415) 421-7879

**FILED**

JUL 23 2001

Reorganization Counsel for the Debtors  
METRICOM, INC.  
METRICOM FINANCE, INC.  
METRICOM INVESTMENTS DC, INC.  
METRICOM DC, L.L.C.  
METRICOM NEW YORK, L.L.C.

KEENAN G. CASADY, CLERK  
United States Bankruptcy Court  
San Jose, California

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

In re:

Chapter 11

METRICOM, INC., a Delaware  
corporation, and certain affiliated entities,  
METRICOM FINANCE, INC.,  
METRICOM INVESTMENTS DC, INC.,  
METRICOM DC, L.L.C., and  
METRICOM NEW YORK, L.L.C.

Jointly Administered for Administrative  
Purposes under

Case No. 01-53291-ASW

Debtors.

Tax I.D. # 77-0294597  
Tax I.D. # 77-0529272  
Tax I.D. # 77-0427605  
Tax I.D. # 52-1971291  
Tax I.D. # 77-0575223

**REVISED ORDER ESTABLISHING  
NOTICE AND CASE MANAGEMENT  
PROCEDURES AND SETTING CLAIMS  
BAR DEADLINE AND OTHER DATES**

[No Hearing Set]

This matter having come before the Court, on the Motion for Order  
Establishing Notice and case Management Procedures (the "Motion"), of Metricom, Inc. (the  
"Debtor") and its domestic subsidiaries, Metricom Finance, Inc., Metricom Investments DC,  
Inc., Metricom DC, L.L.C. and Metricom New York, L.L.C., debtors and debtors-in-  
possession (collectively, the "Debtors"), for an order pursuant to Sections 105 and 521 of 11

REVISED ORDER ESTABLISHING NOTICE AND  
CASE MANAGEMENT PROCEDURES AND  
SETTING CLAIMS BAR DEADLINE AND OTHER  
DATES

1

S:\6331\VP168.kam.RevisedOrder-CaseManagement.doc  
ITEM 2.5.4

MURPHY  
SHENEMAN  
JULIAN &  
ROGERS

A PROFESSIONAL CORPORATION

1 U.S.C. sections 101-1330 (the "Bankruptcy Code") and Bankruptcy Rules 2002(m), 9007  
2 and 9014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"),  
3 establishing special notice and case management procedures in these cases. Unless  
4 otherwise defined herein, capitalized terms used herein shall have the meaning ascribed to  
5 them in the Motion. The Court, having reviewed the Motion and the Declaration of Debtors'  
6 Officer in Support of Chapter 11 Petitions and First Day Motions, considered the other  
7 pleadings, papers, and relevant documents or record and the representations of counsel at the  
8 hearing, and being satisfied that the representations made in the Motion and the supporting  
9 declaration and papers represents no interest adverse to the estates and are in the best  
10 interests of the Debtors' estates, creditors and other parties-in-interest; and it appearing that  
11 notice of the Motion was good and sufficient under the particular circumstances and that no  
12 other or further notice need be given; and good and sufficient cause appearing therefor, it is  
13 hereby

14 **ORDERED, ADJUDGED AND DECREED THAT:**

- 15 1. The Motion is GRANTED as set forth herein.

16 **I**

17 **NOTICE PROCEDURES**

18 **A. Special Notice Matters**

19 2. Procedures for Special Notice Matters. Notice of matters for which the  
20 Bankruptcy Code, the Bankruptcy Rules, or the Local Rules of the United States Bankruptcy  
21 Court for the Northern District of California (the "Local Rules") either (i) authorizes the  
22 Court to designate or limit the parties entitled to notice or (ii) requires notice but does not  
23 designate the parties to be served (the "Special Notice Matters"), shall be deemed to be  
24 adequate and sufficient in these Cases if served upon the parties at their respective addresses  
25 listed on the "Special Notice List," as defined below.

26 3. Additional Notice. Notice of certain Special Notice Matters shall be  
27 served on additional individuals as follows:

28 ///

1 a. Notice of motions to use, sell, or lease property of the estate out  
2 of the ordinary course of business will be given to persons known to claim a lien, security  
3 interest, leasehold, or other interest in the property proposed to be used, sold, or leased;

4 b. Notice of motions to approve compromises or settlements will  
5 be given to parties to the proposed compromise or settlement; if the compromise or  
6 settlement involves claims subject to insurance coverage, notice will also be given to the  
7 insurance company providing coverage, additional insureds, and other insurance companies  
8 that are known to have issued policies whose coverage will be affected by the motion;

9 c. Notice of hearings on motions to assume, reject, or assign  
10 executory contracts and unexpired leases will be given to the contracting parties to the  
11 contract.

12 4. Other Matters. Unless otherwise ordered by the Court, the above-noted  
13 limitations on notice shall not apply to the matters or proceedings referred to in Bankruptcy  
14 Rules 2002(a)(1) (notice of § 341(a) meeting), 2002(a)(4) (motions on dismissal or  
15 conversion), 2002(a)(5) (voting on plan modification), 2002(a)(6) (applications for  
16 compensation), 2002(a)(7) (notices of bar date), 2002(b) (plan confirmation), 2002(d)  
17 (notices to equity holders), and 2002(f) (miscellaneous other motions), which matters or  
18 proceedings shall be noticed in accordance with the applicable Bankruptcy Rules and Local  
19 Rules.

20 5. Electronic Copies. Those parties who request to be served by  
21 electronic transmission and provide an acceptable E-mail address shall receive copies of all  
22 notices served on the Special Notice List by electronic transmission. A party who desires to  
23 be removed from the special notice list or to have all subsequent notices and documents sent  
24 by conventional means must file a written request with the Clerk of the Court and counsel for  
25 the Debtors. Certain documents and non-Special Notice Matters will only be served by  
26 conventional means and will be served upon parties otherwise requesting service by  
27 electronic transmission who provide an acceptable address for service by mail.

28 ///

6. Service on Financial Institutions. Service pursuant to Bankruptcy Rule 7004(h) shall be made by first-class mail (rather than certified mail), or by overnight delivery service or by facsimile, to counsel or an officer designated by the financial institution.

7. Notice Deemed Adequate. Notices given in accordance with the provisions of this Order shall be deemed to be sufficient and adequate notice, inter alia, pursuant to Bankruptcy Rule 2002 and the Local Rules.

**B. Special Notice List**

8. The Debtors are directed to create and maintain a list of persons (the "Special Notice List") who shall receive notice of Special Notice Matters.

9. The Special Notice List shall consist of (a) persons who have a direct, material interest in the subject or issues of a specific motion; (b) persons who have requested notice by filing and serving on Debtors' counsel a request pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure; and, (c) persons who are designated to receive notice in a representative capacity, including, (i) the Office of the United States Trustee, and the U.S. Securities and Exchange Commissions, (ii) counsel for the Debtors, (iii) members of any official committee appointed in these cases, and (iv) counsel and financial advisors for any official committees appointed in these cases under section 1102 or 1114(d) of the Bankruptcy Code. The initial Special Notice List, is approved and shall be effective as of the date of this Order, a copy of which is attached hereto as Exhibit "A."

10. The Special Notice List shall include the creditors listed on each Debtor's List of Creditors Holding 20 Largest Unsecured Claims, a copy of which is attached hereto as Exhibit "B," until such time as the United States Trustee appoints the official committee(s) of unsecured creditors in these jointly administered cases.

11. Debtor's counsel shall update the Special Notice List at least every other week.

**C. Request for Copies of the Special Notice List**

12. Electronic Copies. Those parties on the Special Notice List who provide the Debtor's counsel their E-mail address shall receive an electronic copy of the

Special Notice List when it is updated, provided, however, that such party will not be served notice by electronic transmission unless specifically requested in the notice requesting to be added to the special notice list. A party may request a copy of the Special Notice List to be transmitted by E-mail by sending such request to counsel to Debtor's counsel at [www.metricom.msjr.com](http://www.metricom.msjr.com).

13. Hard Copies. A party may request a copy of the Special Notice List to be provided by either first class mail or facsimile by serving a written request on counsel for the Debtors.

14. Website. The Special Notice List shall also be available electronically on this Court's web-site at ("[www.canb.uscourts.gov](http://www.canb.uscourts.gov)").

## II

### CASE MANAGEMENT PROCEDURES

#### A. Appointment of Claims, Noticing and Balloting Agent

15. The agent appointed as the claims, noticing and balloting agent in this chapter 11 case (the "Noticing Agent"), as of the commencement of this case, pursuant to the Order Authorizing Appointment of Claims, Noticing and Balloting Agent of the Bankruptcy Court (the "Claims, Noticing and Balloting Agent Order") and 28 U.S.C. §156(c), is authorized to perform the services set forth in the Claims, Noticing and Balloting Agent Order and herein. The Noticing Agent will perform various services at the request of the Clerk's Office or the Debtors, but will be independent of the Debtors as provided in the Claims, Noticing and Balloting Agent Order.

#### B. Delegation of Noticing and Service Functions

16. Notice Served by Noticing Agent. For notices required to be served by the Debtors, United States Trustee, any official committee(s) or the Court on all creditors and equity security holders, (a) such notices will be served by the Noticing Agent and (b) the Noticing Agent shall file a declaration of service within five (5) business days after such service. For notices required to be served on fewer than all creditors and equity security holders, (a) the Debtors or the Court may elect to employ the Noticing Agent to serve such

1 notices, (b) the Noticing Agent shall file a declaration of service within five (5) business days  
2 after such service, and (c) the Noticing Agent should attempt to file the papers being served  
3 with the declaration of service.

4 17. Notice of Motions and other Pleadings. Except as provided in  
5 **paragraph 16** above, or otherwise ordered, the party or parties filing a particular pleading or  
6 other document with the Court will be obliged to perform the noticing and service functions  
7 relevant to such pleading or other document, and such party or parties will be required to file  
8 with the Clerk of the Court a declaration of service contemporaneously with the filing of the  
9 document.

10 18. Exhibits. In those instances in which the exhibits to motions are  
11 voluminous, the Debtors, the United States Trustee, any official committee or other moving  
12 party are permitted to serve the motions or applications, accompanying memoranda and  
13 declarations (if any) without the exhibits, provided that such exhibits are filed with the Court  
14 and served on the Debtors, Debtor's counsel, the United States Trustee, and any official  
15 committee(s), and Committee counsel, and are made available in hard copy form upon  
16 written request therefore from any other party.

17 19. Entry of Judgment or Order. With respect to the noticing of the entry  
18 of any order or judgment, Bankruptcy Local Rule 9022-1 shall govern when applicable.

19 20. Court Docket. The Clerk's Office shall create and maintain the official  
20 files and the docket of this case and of any adversary proceedings commenced in connection  
21 with or related to this case.

22 **C. Motions, Objections and Hearing Dates**

23 21. Hearing Dates. All-purpose hearing dates may be scheduled by this  
24 Case on a regular basis pursuant to Court order. Unless otherwise ordered by the Court, all  
25 matters requiring a hearing shall be heard on these all-purpose hearing dates. It shall be the  
26 responsibility of the party seeking a hearing on one of the all-purpose hearing dates to obtain  
27 the next available date from the calendar clerk of the Court, and to serve and file its papers  
28 sufficiently in advance of the pertinent all-purpose hearing date to provide parties in interest

1 with the number of days notice of the hearing that are required for such motion or application  
2 under the Federal Rules of Bankruptcy Procedure and the Bankruptcy Local Rules, as such  
3 may be in force from time to time. The dates and procedures for omnibus hearing dates  
4 (including procedures for telephonic appearances) shall be set by the Court.

5           22. Special Notice Matters. Unless the Court enters an order shortening  
6 time regarding a specific Special Notice Matter, notice of hearings and the filing of initial  
7 papers and responsive pleadings shall be in accordance with the Bankruptcy Rules and the  
8 Local Rules, and shall comply with the provisions of Bankruptcy Local Rule 9014-1. Notice  
9 of a Special Notice Matter shall include:

- 10                   (a) A brief statement of the relief sought and the basis for relief;  
11                   (b) The date by which objections must be filed and served;  
12                   (c) A statement that failure to timely file an objection may be  
13                       deemed a consent to the relief sought.

14           23. Ex Parte Motions for Orders Shortening Time. Parties seeking to  
15 shorten time for a hearing pursuant to an Ex Parte Motion for Order Shortening Time shall be  
16 required to comply with the provisions of Bankruptcy Local Rule 9006-1(c)(1)-(4), and, in  
17 particular, to disclose to the Court in writing any affirmative request by the respondent to  
18 such Ex Parte Motion (such as a request that the Court hold a hearing on the request to  
19 shorten time), as contemplated by Local Rule 9006-1.

20           **D. Procedures for Filing of Papers and Request for Copies**

21           24. Except for proofs of claim (see below), pursuant to Bankruptcy Local  
22 Rule 1002-1, the place to file all pleadings in person and by mail is the United States  
23 Bankruptcy Court, 280 South First Street, San Jose, California 95113-3099.

24           25. Pursuant to Bankruptcy Local Rule 1002-2(b), each original paper filed  
25 in this case (including pleadings, exhibits, memoranda, notices and orders of the Court),  
26 excluding proofs of claims, shall be filed with three (3) copies, two-hole punched at the top  
27 with no backing sheet. The distribution of papers by the Clerk of the Bankruptcy Court shall  
28 be as follows:

- a. Original and one copy to the Clerk of the Bankruptcy Court;
- b. One copy marked "Judge's Copy" for the Judge; and
- c. One copy for return to the party initiating the filing with a self-addressed stamped envelope.

26. In order to assist the Clerk's staff, all original documents presented for filing shall be conspicuously marked "Original" on the caption page, and all copies shall be marked "Copy" on the caption page. All originals shall be executed by the moving party, declarant or counsel, as the case may be, in blue ink. On all pleadings and documents filed with the Court, the date and time of the hearing must appear prominently on the face page of the pleading or document.

27. For the convenience of the Clerk's staff and interested parties, requests for copies of documents filed in this case shall not be made to the Clerk's staff. Rather, the Debtors are authorized to employ Jim Copy Service ("Copy Service") as the copy service in this case. All requests for copies of pleadings and other papers or documents filed in this case should be addressed directly to the Copy Service at the following address and telephone number:

Jim's Copy Service  
280 South First Street, Room 3044  
San Jose, CA 95113  
Telephone No.: (408) 294 - 5200

28. The Copy Service is hereby designated to respond to all copy requests in the Debtors' chapter 11 cases. All copy requests for filed documents or the case docket must be made to the Copy Service rather than the Clerk's staff.

**E. Filing of Proofs of Claims; Claims Bar Date**

29. The place for filing proofs of claims either by hand or by mail, shall be to the Noticing Agent, at Metricom, Inc., c/o Robert L. Berger & Associates, LLC, PMB 1015, 10351 Santa Monica Blvd., Suite 101A, Los Angeles, California 90025. Each original claim shall be filed with one (1) copy for the Noticing Agent. Parties filing proofs of claim who wish to obtain a file-stamp copy of their claim may include an extra copy and a postage-



1 paid, self-addressed envelope for use by the Noticing Agent. **Proofs of claims shall not be**  
2 **filed with the Bankruptcy Court.**

3 30. In order to facilitate an orderly and efficient claims filing and claims  
4 reconciliation and resolution process, the Noticing Agent may create and serve upon  
5 creditors a form of Proof of Claim which contains "coded information" concerning the type  
6 of claim by category, and amount of claim, as such information may be reflected on the  
7 Debtors' Schedules of Assets and Liabilities on file in this case.

8 31. Notwithstanding Bankruptcy Local Rule 3003-1, the Court hereby  
9 establishes October 17, 2001 as the last day for filing proofs of claim and proofs of interest  
10 (the "Claims Bar Date") in these cases for all creditors except governmental units, and  
11 November 16, 2001 as the last day for filing claims by governmental units (the  
12 "Governmental Claims Bar Date"). The Claims Bar Date shall also be the last day for any  
13 person to file with the Claims and Noticing Agent a proof of interest evidencing any equity  
14 interest in the Debtors, including limited partnership interest, general partnership interests,  
15 common stock, preferred stock, preferred partnership interests, or membership interests. The  
16 Noticing Agent shall serve notice of the Claims Bar Date and a Proof of Claim form on all  
17 known creditors and equity security holders no later than the date first set for the First  
18 Meeting of Creditors pursuant to Section 341(a) of the Bankruptcy Code.

19 **F. Form and Service of Notice of Case Commencement, Meeting of**  
20 **Creditors, Special Procedures and Deadlines**

21 32. The form of Notice of Chapter 11 Bankruptcy Case, Meeting of  
22 Creditors, Special Procedures and Deadlines (the "Initial Notice") attached hereto as Exhibit  
23 "C" is approved.

24 33. The Noticing Agent is directed to serve the Initial Notice by mail as  
25 soon as practicable but in no event later than July 27, 2001, on all known creditors, equity  
26 security holders and parties in interest in this case, and all parties who have requested special  
27 notice in this case, as required by Bankruptcy Rules 2002(a)(2), (d), (f), (i), (j) and (k).

28 ///

34. The Debtors shall direct that the Initial Notice shall be published in substantially the same form as in Exhibit "C" in those publications listed in Exhibit "D" as soon as practicable but in no event later than July 27, 2001.

35. Pursuant to Bankruptcy Rule 2003(a) and the approval by the Office of the United States Trustee, the date for the first meeting of creditors required under section 341(a) of the Bankruptcy Code shall be on August 17, 2001 at 10:00 a.m., at 280 South First Street, Room 130, San Jose, California, 95113, unless rescheduled by the Office of the United States Trustee.

**G. Posting of Documents On Web Sites**

36. The Debtors are authorized to establish and maintain an independent, separately named web site (the "Independent Web Site"), provided that the appearance of the Independent Web Site is subject to approval by the Clerk of the Court. The Debtors shall post on the Independent Web Site:

- a. the Special Notice List;
- b. a copy of this Order;
- c. The Initial Notice; and
- d. Such other notices and pleadings as the Court may authorize or order from time to time during these cases.

37. The Independent Web Site shall display the Special Notice List (as such may be updated or modified from time to time, and reflecting thereon such last date of modification) and this Order. In addition, the Independent web sit shall display the following disclaimer:

Please take note that this web site has been established, and is being maintained and operated by the Debtors, Metricom, Inc., Metricom DC, L.L.C., Metricom Investments DC, Inc., Metricom Finance, Inc., Metricom New York, L.L.C., and certain affiliated entities, at the direction of the United States Bankruptcy Court, Northern District of California pursuant to the Order Establishing Notice and Case Management Procedures issued \_\_\_\_\_, 20\_\_. This web site is not the web site of the court. While every attempt is being made to assure the accuracy of the information contained on the site, the web site does not contain or comprise the official court record.

MURPHY  
SHENEMAN  
JULIAN &  
ROGERS

A PROFESSIONAL CORPORATION

The site is being made available merely as a convenience to all interested parties and the public.

DATED: JUL 23 2001

By: **ARTHUR S. WEISSBRODT**  
UNITED STATES BANKRUPTCY JUDGE

MURPHY  
SHENEMAN  
JULIAN &  
ROGERS

A PROFESSIONAL CORPORATION

**EXHIBIT A**

**to Order Establishing Notice and Case Management Procedures**

**SPECIAL NOTICE LIST**

**The United States Trustee**

Office of the United States Trustee  
280 South First Street, Room 268  
San Jose, CA 95113  
Attn: Robert S. Gebhard, Esq.  
Phone: (408) 535-5525  
Fax: (408) 535-5532

**The Debtors**

Metricom, Inc.  
333 West Julian Street  
San Jose, CA 95110  
Attn: Dale W. Marquart, Esq.  
Phone: (408) 282-3000  
Fax: (408) 282-3074

Metricom, Inc.  
333 West Julian Street  
San Jose, CA 95110  
Attn: Kevin I. Dowd.  
Chief Restructuring Officer

**Counsel for the Debtors**

Murphy Sheneman Julian & Rogers  
101 California Street, Suite 3900  
San Francisco, CA 94111  
Attn: Margaret Sheneman, Esq.  
Keith A. McDaniels, Esq.  
Phone: (415) 398-4700  
Fax: (415) 421-7879

**Counsel for the Unsecured Creditors**

Pachulski, Stang, Ziehl, Young & Jones  
10100 Santa Monica Blvd., Suite 100  
Los Angeles, CA 90067-4102  
Attn: Richard M. Pachulski, Esq.  
Phone: (310) 277-6910  
Fax: (310) 201-0760

Pachulski, Stang, Ziehl, Young & Jones  
3 Embarcadero Center, Suite 1100  
San Francisco, CA 94111  
Attn: John D. Fiero, Esq.  
Phone: (415) 263-7000  
Fax: (415) 263-7010

**Special Counsel for Debtors**

Cooley Godward LLP  
One Maritime Plaza  
20th Floor  
San Francisco, CA 94111-3580  
Attn: Joseph A. Scherer, Esq.  
Kenneth L. Guernsey, Esq.  
Phone: (415) 693-2000  
Fax: (415) 951-3699

**Counsel for the Bondholders**

Andrews & Kurth L.L.P.  
805 Third Avenue  
New York, NY 10022  
Attn: Paul N. Silverstein, Esq.  
Phone: (212) 850-2819  
Fax: (212) 850-2929

MURPHY  
SHENEMAN  
JULIAN &  
ROGERS

A PROFESSIONAL CORPORATION

**Advisors to Bondholders**

Houlihan Lokey Howard & Zukin  
1930 Century Park West, 2nd Floor  
Los Angeles, CA 90067-6803  
Attn: Andrew B. Miller, Esq.  
Phone: (310) 553-8871  
Fax: (310) 553-4024

United States Securities and Exchange  
Commission  
Attn: Bankruptcy Counsel  
Advisors to Bondholders  
5670 Wilshire Boulevard, Floor 11  
Los Angeles, CA 90036

**Counsel for WorldCom**

Piper Marbury Rudnick & Wolfe LLP  
6225 Smith Avenue  
Baltimore, MD 21209-3600  
Attn: Eric B. Miller, Esq.  
Phone: (410) 580-4216  
Fax: (410) 580-3216

McCutchen, Doyle, Brown & Enersen  
Three Embarcadero Center, 28<sup>th</sup> Floor  
San Francisco, CA 94111-4031  
Attn: William Bates III, Esq.  
Phone: (415) 393-2000  
Fax: (415) 393-2286

**Advisors to Unsecured Creditors**

E & Y Capital Advisors LLC  
1451 California Avenue  
Palo Alto, CA 94304  
Attn: Mr. Eric Carlson  
Phone: (650) 849-4768  
Fax: (650) 496-4672

E & Y Capital Advisors LLC  
725 South Figueroa Street  
Los Angeles,, CA 90017-5418  
Attn: Marc A. Bilbao  
Phone: (213) 977-3466  
Fax: (650) 977-3079

MURPHY  
SHENEMAN  
JULIAN &  
ROGERS

A PROFESSIONAL CORPORATION

**EXHIBIT B**

**to Order Establishing Notice and Case Management Procedures**

**LIST OF 20 LARGEST UNSECURED CREDITORS**

<b>Name of Creditor and Mailing Address</b>	<b>Name, Telephone Number of Person to Be Contacted</b>
Bank One Trust Company, N.A. As Indenture Trustee Attn. Corporate Trust Administration One North State Street, 9th Floor Chicago, Illinois 60602 Fax: 312.407.1708	Paul N. Silverstein, Esq. Andrews & Kurth L.L.P 805 Third Avenue New York, NY 10022 Phone 212.850.2819 Fax: 212.850.2929
WorldCom 6929 N. Lakewood Ave. Tulsa, OK 74117  WorldCom 500 Clinton Center Drive Clinton, MS 39056	Larry Meschberger, Sr. VP WorldCom 2400 N. Glenville Dr. Richardson, TX 75082 Phone: 972.729.7900 Fax: 972.729.7907  Brian H. Benjet, Esq. WorldCom 1133 19th St., NW Washington, DC 20036 Phone: 202.736.6409 Fax: 202.736.6346

MURPHY  
SHENEMAN  
JULIAN &  
ROGERS

A PROFESSIONAL CORPORATION

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Name of Creditor and Mailing Address	Name, Telephone Number of Person to Be Contacted
Sanmina Corporation 2700 N. First St., Building 1 San Jose, CA 95134	Randy Furr, President Steve Jackman, Esq. Phone: 408.964.3612 Fax: 408.964.3636  Richard M. Pachulski, Esq. Pachulski, Stang, Ziehl, Young & Jones P.C. 10100 Santa Monica Blvd., Ste. 1100 Los Angeles, CA 90067 Phone: 310.277.6910 Fax: 310.201.0760
Whalen & Company, Inc. 3675 Mt. Diablo Blvd., Suite 360 Lafayette, CA 94549	Michael Bush, CEO Phone: 925.283.7700 Fax: 925.283.7703
Sierra Wireless Data, Inc. Park 80 West Plaza 2, Suite 200 Saddlebrook, NJ 07663-5836	David Sutcliffe, CEO Andrew Harries, Sr. VP Sierra Wireless 13811 Wireless Way Richmond, BC Canada V6V3A4 Phone: 604.231.1161 Fax: 604.231.1103
Novatel Wireless 9360 Towne Centre Dr., #110 San Diego, CA 92121-3030	John Major, President Dan Halvorson, Treasurer Phone: 858.812.3406 Fax: 858.812.3414

MURPHY  
SHENEMAN  
JULIAN &  
ROGERS

A PROFESSIONAL CORPORATION

Name of Creditor and Mailing Address	Name, Telephone Number of Person to Be Contacted
General Dynamics Wireless Systems Division 77 "A" Street Needham Heights, MA 02194-2892	Dick Scott, Vice President Vincent S. Antonacci, Esq. Phone: 781.455.2914 Fax: 781.455.3355
Wireless Web Connect!, Inc. 620 Lakeview Rd. Clearwater, FL 33756	John McDonald, CEO Deac Finn, President Neil Byrne, Sr. VP Wireless Web Connect!, Inc. 2155 Chenault, Suite 410 Carrollton, TX 75006-5023 Phone: 800.811.7426 Fax: 727.450.2538
NatSteel Electronics 389 Woodview Ave. Morgan Hill, CA 95037	Brian Chin Global Credit Manager NatSteel Electronics 847 Gibraltar Dr., Building 5 Milpitas, CA 95035 Phone: 408.956.7543 408.956.7562 Fax: 408.956.6445  Lawrence M. Schwab, Esq. Bialson, Bergen & Schwab 300 Stanford Financial Square 2600 El Camino Real Palo Alto, CA 94306 Phone: 650.857.9500 Fax: 650.494.2738
Wireless Facilities, Inc. 9805 Scranton Rd., #100 San Diego, CA 92121	Tom Munro, President Brad Weller, Esq. Wireless Facilities, Inc. 4810 Eastgate Mall San Diego, CA 92121 Phone: 858.228.2287 Fax: 858.228.2018
National Semiconductor 2900 Semiconductor Drive Santa Clara, CA 95052-8090	Nancy Lucke-Ludgus, Esq. Phone: 408.721.6782 Fax: 408.733.0293

MURPHY  
SHENEMAN  
JULIAN &  
ROGERS

A PROFESSIONAL CORPORATION



Name of Creditor and Mailing Address	Name, Telephone Number of Person to Be Contacted
American Tower Corp. 3411 Richmond Ave., Suite 400 Houston, TX 77046-3401	Steve Moskovitz, Exec. VP American Tower Corp. 116 Huntington Ave. Boston, MA 02116 Phone: 617.585.7650 Fax: 617.585.7676  Chris Maguire Western Regional VP American Tower Corp. 3411 Richmond Ave., Suite 400 Houston, TX 77046-3401
GoAmerica 401 Hackensack Ave. Hackensack, NJ 07601	Marty May, VP GoAmerica 433 Hackensack Ave. Hackensack, NJ 07601  Phone: 201.996.7313 Fax: 201.996.1772
Broadwing Communications 1122 Capital of Texas Hwy. South Austin, TX 78746-6426	John Colucci, VP Mary Carrigan Phone: 512.742.3700 Fax: 512.328.7982
Juno 120 W. 45th St. New York, NY 10036	Wendy Rosenberg, Sr. VP Juno 1540 Broadway, 27th Floor New York, NY 10010 Phone: 212.594.9237 Fax: 212.597.9200
Reliant Energy P.O. Box 4567 Houston, TX 77210-4567	Dan Howell Phone: 713.207.3000 Fax:
Kirshenbaum Bond & Partners West 539 Bryant St., Suite 302 San Francisco, CA 94107	Nigel Carr, General Manager Phone: 415.541.9555 Fax: 415.541.9559

MURPHY  
SHENEMAN  
JULIAN &  
ROGERS

A PROFESSIONAL CORPORATION

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Name of Creditor and Mailing Address	Name, Telephone Number of Person to Be Contacted
GDM Electronic & Medical Assembly 919 Hanson Court Milpitas, CA 95035	Grant Murphy, President Phone: 408.945.4100 Fax: 408.945.4070
Drax, Inc. 2317 International Lane, Suite 211 Madison, WI 53704	Andrew Langum, President Phone: 608.661.1262 Fax: 608.661.1261
Spectrasite Communications, Inc. 7940 Silverton Ave., Suite 9 San Diego, CA 92126	Richard Byrne, President Ronald Tuceri Ralph Deppish Spectrasite Communications, Inc. 100 Regency Forest Drive, #400 Cary, NC 27511 Phone: 919.465.6566 Fax: 919.465.6824

MURPHY  
SHENEMAN  
JULIAN &  
ROGERS

A PROFESSIONAL CORPORATION

EXHIBIT C

to Order Establishing Notice and Case Management Procedures

FORM OF NOTICE OF CHAPTER 11 BANKRUPTCY CASE, MEETING OF CREDITORS, SPECIAL PROCEDURES AND DEADLINES

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

In re	Jointly Administered for Procedural Purposes under
METRICOM, INC. and certain affiliated entities, including	Case No. 01-53291-ASW
METRICOM FINANCE, INC.	
METRICOM INVESTMENTS DC, INC.	Chapter 11
METRICOM DC, L.L.C.	
METRICOM NEW YORK, L.L.C.	NOTICE OF CHAPTER 11 BANKRUPTCY CASES, MEETING OF CREDITORS, SPECIAL PROCEDURES, AND DEADLINES FOR FILING CLAIMS
Debtors.	

Bankruptcy cases under chapter 11 of the Bankruptcy Code (title 11, United States Code) have been filed in this Court by Metricom, Inc. and its domestic subsidiaries, Metricom Finance, Inc., Metricom Investments DC, Inc., Metricom DC, L.L.C., and Metricom New York, L.L.C. (collectively, the "Debtors"), debtors and debtors-in possession, and an order for relief has been entered. The cases are assigned to the Honorable Arthur S. Weissbrodt, United States Bankruptcy Judge. Chapter 11 allows the Debtors to reorganize or liquidate pursuant to a plan. No plan has been filed yet, and a plan is not effective unless confirmed by the Court. In the future, you may be sent a copy of a plan and a disclosure statement telling you about the plan, and you might have the opportunity to vote on the plan. You will be sent notice of the date of the confirmation hearing, and you may object to confirmation of the plan and attend the confirmation hearing. Unless a trustee is serving, the Debtors will remain in possession of the Debtors' property and may continue to operate any business.

Legal Advice. The staff of the bankruptcy clerk's office cannot give legal advice. You may want to consult an attorney to protect your rights.

Attorney(s) for Debtors (name and address)	Margaret Sheneman Keith A. McDaniels Murphy Sheneman Julian & Rogers A Professional Corporation 101 California Street, Suite 3900 San Francisco, CA 94111 Telephone No.: (415) 616-7614
---	---

MEETING OF CREDITORS

DATE: August 17, 2001	Location: Office of the United States Trustee San Jose Division 280 S. First Street, Room 130 San Jose, CA 95113-3099
TIME: 10:00 a.m.	

*The Debtors' representative must be present at the meeting to be questioned under oath by the United States Trustee and by creditors. Creditors are welcome to attend, but are not required to do so. The meeting may be continued and concluded at a later date without further notice.*

COURT FILINGS (OTHER THAN PROOFS OF CLAIM)

An original and three (3) copies of all pleadings and other papers or documents (other than proofs of claim - see below) must be submitted for filing. All papers must be 2-hole punched at the top and all original documents must be conspicuously marked "Original" with signatures in blue ink and one copy must be marked "Judge's Copy." You may inspect all papers filed, including the list of the debtors' property and debts at the bankruptcy clerk's office.

**By U.S. Mail**

United States Bankruptcy Court  
Attn: Janet Dustin  
San Jose Division  
280 South First Street, Room 3035  
San Jose, CA 95113-3099

To receive a return copy of your filing showing the Clerk's file stamp, you must provide a postage-paid, self-addressed envelope.

**In person / by overnight delivery**

United States Bankruptcy Court  
San Jose Division  
280 South First Street, Room 3035  
San Jose, CA 95113-3099

Open 9:00 a.m. to 4:30 p.m. (but all documents requiring a fee must be processed by 4:00 p.m.), Monday through Friday, except federal holidays.

**PHOTOCOPY REQUESTS (OTHER THAN PROOFS OF CLAIM)**

To obtain a photocopy of any document on file with the court (other than proofs of claim), contact the following independent photocopy service (the "Copy Service"):

Jim's Copy Service  
280 South First Street, Room 3044  
San Jose, CA 95113  
Telephone No.: (408) 294-5200

A description of the photocopying services, charges and billing procedures is available from the Copy Service. PLEASE DO NOT ADDRESS PHOTOCOPY REQUESTS TO THE BANKRUPTCY COURT OR TO COUNSEL FOR DEBTORS.

**DEADLINE AND PLACE TO FILE A PROOF OF CLAIM**

The Court has established October 17, 2001 as the deadline for filing proofs of claim. Your proof of claim must be received by October 17, 2001 (except for governmental units, whose claims must be received by November 16, 2001), notwithstanding Bankruptcy Local Rule 3003-1. A Proof of Claim form is not included with this Notice, but will be mailed to you separately at a later date as more particularly described below.

A Proof of Claim is a signed statement describing a creditor's claim. The debtors will file schedules of assets and liabilities in this case which may contain information about your claim. If your claim is scheduled and is not listed as disputed, contingent or unliquidated, it will be allowed in the amount scheduled unless you file a Proof of Claim or you are sent further notice about the Claim. Whether or not your claim is scheduled you are permitted to file a Proof of Claim. If your claim is not listed at all or if your claim is listed as disputed, contingent or unliquidated, then you must file a Proof of Claim or you might not be paid any money on your claim against the Debtors in these bankruptcy cases.

Robert Berger & Associates, L.L.C. has been appointed by the Court as the Claims, Noticing and Balloting Agent in these cases. The Claims, Noticing and Balloting Agent will send you a separate notice of the Claims Bar Date and a Proof of Claim form. If you do not receive a Proof of Claim form, you may obtain a form from the Claims, Noticing and Balloting Agent. The Proof of Claim form sent by the Claims, Noticing and Balloting Agent will include your name, how your claim was scheduled, and a creditor number established by the Claims, Noticing and Balloting Agent.

All Proofs of Claim shall be filed with the Claims, Noticing and Balloting Agent by mailing to the following address:

Metricom, Inc.  
c/o Robert L. Berger & Associates, LLC  
PMB 1015  
10351 Santa Monica Blvd., Suite 101A  
Los Angeles, CA 90025  
Telephone: (818) 771-7751

Open: 8:30 a.m. - 5:00 p.m. Monday through Friday, except general business holidays

Each original claim shall be filed with one (1) copy. Parties filing proofs of claim who wish to receive a return copy of their proof of claim showing the Clerk's file stamp must provide an extra copy (in addition to the original and one copy required by the preceding sentence) and a postage-paid, self-addressed envelope. **PROOFS OF CLAIM SHALL NOT BE FILED WITH THE BANKRUPTCY COURT.** Persons who hold common stock, preferred stock, or equity interests in the Debtors do not need to file a proof of interest at this time.

**CREDITORS MAY NOT TAKE CERTAIN ACTIONS**

The filing of the bankruptcy case automatically stays certain collection and other actions against the debtors and the debtors' property.

REVISED ORDER ESTABLISHING NOTICE AND  
CASE MANAGEMENT PROCEDURES AND  
SETTING CLAIMS BAR DEADLINE AND OTHER  
DATES

20

S:\6331\VP168.kam.RevisedOrder-CaseManagement.doc  
ITEM 2.5.4

MURPHY  
SHENEMAN  
JULIAN &  
ROGERS

A PROFESSIONAL CORPORATION

1 Prohibited collection actions are listed in Bankruptcy Code section 362. Common examples of prohibited actions include contacting the  
2 debtors by telephone, mail or otherwise to demand repayment; taking actions to collect money or obtain property from the debtors; and  
3 starting or continuing lawsuits against the debtors. If you attempt to collect a debt or take other action in violation of the Bankruptcy  
Code, you may be penalized.

#### 4 SPECIAL PROCEDURES

5 The Court has entered an Order Establishing Notice and Case Management Procedures and Setting Claims Bar Deadline and Other Dates  
6 containing information relating to, among other things: (1) procedures governing the filing and service of motion papers, oppositions  
and replies; (2) the establishment of hearing dates in these bankruptcy cases; and (3) procedures for seeking ex parte or expedited  
hearings.

#### 7 DISCHARGE OF DEBTS

8 Confirmation of a chapter 11 plan may result in a discharge of debts, which may include all or part of your debt. See Bankruptcy Code §  
1141(d). A discharge means that you may never try to collect the debt from the Debtors, except as provided in the plan.

#### 9 NOTICES OF CERTAIN HEARINGS AND RELATED MATTERS

10 All Creditors and certain parties in interest will receive notice by mail or by publication of the following matters: (1) any hearing on the  
dismissal of the cases or conversion of the cases; (2) the following matters related to the plan of reorganization: the time fixed for filing  
objections to and the hearing to consider approval of a disclosure statement, the time fixed for accepting, rejecting and objecting to  
confirmation of a plan or any modification thereof, and the hearing thereon and the entry of an order confirming a plan; and (3) any other  
matter which the Court requires that notice be served on all creditors and interest holders.

12 Pursuant to the Order Establishing Notice and Case Management Procedures and Setting Claims Bar Deadline and Other Dates, in order  
to receive notice of other proceedings in this case, you will be required to file with the Clerk of the Bankruptcy Court and serve upon  
counsel for the Debtors a written request for notice. A copy of the Order Establishing Notice and Case Management Procedures and  
Setting Claims Bar Deadline and Other Dates, and of the current list of the parties who are entitled to receive notice of matters, is  
available by requesting such list from the Debtors' counsel at the following location:

Murphy Sheneman Julian & Rogers  
101 California Street, Suite 3900  
San Francisco, CA 94111  
Telephone No.: (415) 616-7614  
Attn: Bill Petty

17 DATED: July \_\_, 2001

For the Court: Clerk of the Bankruptcy Court

26 MURPHY  
27 SHENEMAN  
28 JULIAN &  
ROGERS

A PROFESSIONAL CORPORATION

**EXHIBIT D**

**to Order Establishing Notice and Case Management Procedures**

**PUBLICATIONS**

<b>Location</b>	<b>Publication</b>
Atlanta, Georgia	Atlanta Journal
Baltimore, Maryland	The Baltimore Sun
Chicago, Illinois	Chicago Tribune
Dallas, Texas	Dallas Morning News
Denver, Colorado	The Denver Post
Detroit, Michigan	Detroit News
Houston, Texas	Houston Chronicle
Los Angeles, California	Los Angeles Times
Minneapolis, Minnesota	Star Tribune
New York City, New York	New York Times
Philadelphia, Pennsylvania	Philadelphia Inquirer
Phoenix, Arizona	The Arizona Republic
San Diego, California	The San Diego Union-Tribune
San Francisco, California	San Francisco Chronicle
San Jose, California	San Jose Mercury News
Seattle, Washington	Seattle Post-Intelligencer
Washington D.C.	The Washington Post
National	The Wall Street Journal